

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

IOWA PRIMATE LEARNING)	
SANCTUARY d/b/a GREAT APE TRUST)	Case No. 4:10-cv-00052-RAW
and APE COGNITION AND)	
COMMUNICATION INSTITUTE,)	
)	PLAINTIFFS' WITNESS LIST
Plaintiffs,)	
)	
v.)	
)	
ZOOLOGICAL FOUNDATION OF)	
GEORGIA, INC. d/b/a ZOO ATLANTA,)	
DEMOCRATIC REPUBLIC OF CONGO,)	
JAPAN MONKEY CENTRE INSTITUTE)	
AND MUSEUM OF PRIMATOLOGY, SUE)	
SAVAGE-RUMBAUGH, Ph. D., and)	
BONOBO HOPE INITIATIVE, INC.,)	
)	
Defendants.)	

COME NOW Plaintiffs Iowa Primary Learning Sanctuary d/b/a Great Ape Trust (“IPLS”) and Ape Cognition and Communication Institute (“ACCI”), pursuant to Federal Rule of Civil Procedure 26(a)(3)(C), Local Rule 83.6, the Court’s Order Following Status Conference Concerning Evidentiary Hearing and Other Deadlines, and Court’s Order Continuing Status Conference entered herein, and provide their Witness List:

WITNESS LIST

Plaintiffs may call the following witnesses at the trial of this matter, either live or by deposition. Plaintiffs are providing herein a general description of the witnesses’ anticipated testimony that is not intended to be a comprehensive description of the precise testimony to be provided:

1. George Caudill, may be contacted through Plaintiffs' counsel. Mr. Caudill is currently a member of the Board of Directors of ACCI who has interacted with Defendant Sue Savage-Rumbaugh, Ph.D. ("Dr. Rumbaugh") and members of Defendant Bonobo Hope Initiative, Inc. ("BHI") over time. Mr. Caudill will testify to these interactions and other information relating to his service on the governing bod(ies) of the "Great Ape Trust" or related entities including, but not limited to, the activities and operations of the same. In addition, Mr. Caudill has observed Dr. Rumbaugh's behavior and activities in relation to bonobos and humans over time and will testify to the same.
2. Julie Gilmore, DVM; may be contacted through Plaintiffs' counsel. Dr. Gilmore is currently a member of the Board of Directors of ACCI who has interacted with Dr. Rumbaugh and members of BHI over time. Dr. Gilmore will testify to these interactions and other information relating to her service on the governing bod(ies) the "Great Ape Trust" or related entities including, but not limited to, the the activities and operations of the same. Dr. Gilmore will also testify to veterinary and other care rendered to the bonobos over time. In addition, Dr. Gilmore has observed Dr. Rumbaugh's behavior and activities in relation to bonobos and humans over time and will testify to the same.
3. Patricia Gray, Ph.D., Adjunct Clinical Professor, Director of BioMusic, The University of North Carolina Greensboro, p-gray@uncg.edu. Dr. Gray has collaborated with Dr. Rumbaugh on at least one prior project, observed Dr. Rumbaugh's behavior in relation to the bonobos and humans over time, and continues to work with some or all of the bonobos at issue herein in relation to

ACCI. She will testify regarding these sets of circumstances. Plaintiffs **do not** guarantee Dr. Gray's presence at the hearing.

4. William Hopkins, Ph.D., may be contacted through Plaintiffs' counsel. Dr. Hopkins is currently a member of the Board of Directors of ACCI who has interacted with Dr. Rumbaugh and members of BHI over time. Dr. Hopkins will testify to these interactions and other information relating to his service on the governing body for ACCI including, but not limited to, the activities and operations of the same. In addition, Dr. Hopkins has observed Dr. Rumbaugh's behavior and activities in relation to bonobos and humans over time and will testify to the same.
5. Allen Schroeder, ajschroeder@blankparkzoo.org. Mr. Schroeder is a past employee of the Great Ape Trust who interacted directly with Dr. Rumbaugh. In addition, Dr. Gilmore has observed Dr. Rumbaugh's behavior in relation to bonobos and humans over time and will testify to the same. Mr. Schroeder will testify to specific circumstances where Dr. Rumbaugh put him in danger as well as testifying to observations he made with respect to Dr. Rumbaugh's behavior. Plaintiffs **do not** guarantee Mr. Schroeder's presence at the hearing.
6. Ken Schweller, Ph.D., Professor Emeritus of Computer Science and Psychology, Buena Vista University, schweller@bv.edu. Dr. Schweller is a former member of the Board of Directors of IPLS or related entities who has interacted with Dr. Rumbaugh and members of BHI and ACCI over time. Dr. Schweller will testify to these interactions and other information relating to his service on the governing bod(ies) of IPLS and related entities including, but not limited to, the activities

and operations of the same. In addition, Dr. Schweller has observed Dr. Rumbaugh's behavior and activities in relation to bonobos and humans over time and will testify to the same. Plaintiffs **do not** guarantee Dr. Schweller's presence at the hearing.

7. Al Setka, al@setkacommunications.com. Mr. Setka is a former member of the leadership team of the Great Ape Trust who has interacted with Dr. Rumbaugh and members of IPLS, ACCI, and BHI over time. Mr. Setka will testify to these interactions and other information relating to his service on the governing bodies of IPLS and related entities including, but not limited to, the activities and operations of the same. In addition, Mr. Setka has observed Dr. Rumbaugh's behavior and activities in relation to bonobos and humans over time and will testify to the same. Finally, Mr. Setka will describe the public relations issues and challenges presented to the Great Ape Trust and other entities over time that are only now starting to be overcome subsequent to Dr. Rumbaugh's departure from the facility. Plaintiffs **do not** guarantee Mr. Setka's presence at the hearing.
8. Lyle Simpson, already identified in Defendants' Witness List.
9. Jared Taglialatela, Ph.D., may be contacted through Plaintiffs' counsel. Dr. Taglialatela is currently a member of the Board of Directors of ACCI who has interacted with Dr. Rumbaugh and members of BHI over time. Dr. Taglialatela will testify to these interactions and other information relating to his service on the governing body of ACCI including, but not limited to, the activities and operations of the same. In addition, Dr. Taglialatela has observed Dr. Rumbaugh's behavior and activities in relation to bonobos and humans over time

and will testify to the same. Dr. Taglialatela has been deposed in this case, and his hearing testimony may include those topics discussed during his deposition, as well as others as generally described.

10. David Washburn, Ph.D., Director, Language Research Center, Cognitive Sciences Program and NBN Program, Georgia State University, dwashburn@gsu.edu. Dr. Washburn is familiar with Dr. Taglialatela, Dr. Hopkins, and other persons affiliated with ACCI as well as the activities and operations of the same. He is also familiar with Dr. Rumbaugh and her purported “research trajectory” related to the bonobos. He will testify to both areas. Plaintiffs **do not** guarantee Dr. Washburn’s presence at the hearing.
11. Heidi Lyn, Ph.D, Assistant Professor, Department of Psychology, University of Southern Mississippi, Heidi.Lyn@usm.edu. Dr. Lyn is familiar with Dr. Taglialatela, Dr. Hopkins, and other persons affiliated with ACCI as well as the activities and operations of the same. She is also familiar with Dr. Rumbaugh and her purported “research trajectory” related to the bonobos. She will testify to both areas. Plaintiffs **do not** guarantee Dr. Lyn’s presence at the hearing.
12. Any witness whose testimony is necessary to rebut evidence introduced by Defendants including, but not limited to, the following witnesses who may be called to rebut any denial by Dr. Rumbaugh or BHI that Dr. Rumbaugh has been unable to assure the safety of people or the bonobos: William Fields, Shelly Williams, and Mary Webb. Plaintiffs **do not** guarantee the presence of these witnesses at the hearing.
13. Any other witness, including expert witnesses, named or offered by Defendants.

14. Any witnesses necessary to establish the admissibility of any evidence.
15. Any witnesses whose testimony is necessary to explain, refute, or otherwise address evidence admitted over the objection of Plaintiffs including, but not limited to, the evidentiary matters addressed in any motion or briefing filed by Plaintiffs.

Date: May 13, 2015

/s/ William J. Miller

William J. Miller (AT0005414)

Brian A. Melhus (AT0011421)

Dorsey & Whitney LLP

801 Grand Avenue, Suite 4100

Des Moines, Iowa 50309-2790

Tel: (515) 283-1000

Fax: (515) 283-1060

E-mail: miller.william@dorsey.com

melhus.brian@dorsey.com

ATTORNEYS FOR PLAINTIFFS

Original filed. Copy to:

Todd P. Langel
Faegre Baker Daniels LLP
801 Grand Avenue, 33rd Floor
Des Moines, IA 50309

CERTIFICATE OF SERVICE

The undersigned certifies that on May 13, 2015, the foregoing instrument was served upon all parties to the above case and/or to each of the attorneys of record herein at their respective addresses disclosed on the pleadings:

By: Electronic Filing and/or
_____ U.S. Mail _____ FAX
_____ Hand Delivered _____ Overnight Courier
_____ E-mail _____ Other _____

/s/ Brian A. Melhus

William C. Zifchak
Kaye Scholer LLP
425 Park Avenue
New York, NY 10022

Ross Neihaus
Kaye Scholer LLP
Three First National Plaza
70 West Madison Street, Suite 4200
Chicago, Illinois 60602

Joshua S. Stambaugh
Kaye Scholer LLP
1999 Avenue of the Stars, Suite 1600
Los Angeles, CA 90067

ATTORNEYS FOR DEFENDANTS
DR. SUE SAVAGE-RUMBAUGH,
PH.D. and BONOBO HOPE
INITIATIVE, INC.

Gregory M. Lederer
Kimberly K. Hardeman
Lederer Weston Craig, PLC
118 Third Avenue SE, Suite 700
P.O. Box 1927
Cedar Rapids, IA 52406-1927
ATTORNEYS FOR DEFENDANT
JAPAN MONKEY CENTRE
INSTITUTE AND MUSEUM OF
PRIMATOLOGY

William W. Graham
Graham Ervanian & Cacciatore, LLP
317 Sixth Avenue
Suite 900
Des Moines, IA 50309
ATTORNEYS FOR DEFENDANT
DEMOCRATIC REPUBLIC OF
CONGO